

Exhibit E

Deposition Transcript of L.G.

GORE, et al.

vs.

LEE, et al.

L.G.

April 17, 2020



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1 UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION

4 KAYLA GORE; JAIME COMBS;
5 L.G.; and K.N.,

6 Plaintiffs,

7 vs.

Case No. 3:19-0328

8 WILLIAM BYRON LEE, in his
9 official capacity as Governor
10 of the State of Tennessee;
11 and LISA PIERCEY, in her official
12 capacity as Commissioner of the
13 Tennessee Department of Health,

14 Defendants.

15
16 Videoconference Deposition of:

17 L.G.

18 Taken on behalf of the Defendants
19 April 17, 2020

20
21
22
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I N D E X

Page

Examination
By Mr. Lim

6

E X H I B I T S

Page

Exhibit No. 1

6

Amended Complaint for Declaratory and Injunctive
Relief

Exhibit No. 2

6

Declaration of L.G. in Support of Plaintiffs'
Motion for Summary Judgment

S T I P U L A T I O N S

The videoconference deposition of L.G. was taken by counsel for the Defendants, with all participants appearing at their respective locations, on April 17, 2020, for all purposes under the Federal Rules of Civil Procedure.

All objections, except as to the form of the questions, are reserved to the hearing, and that said deposition may be read and used in evidence in said cause of action in any trial thereon or any proceeding herein.

It is agreed that JEANNIE CHAFFIN, LCR, Notary Public and Court Reporter for the State of Tennessee, may swear the witness, and that the reading and signing of the completed deposition by the witness was not waived.

1 * * *

2
3 (WHEREUPON, documents were pre-marked as
4 Exhibits 1 and 2.)

5 MR. LIM: Good afternoon, everyone. A 12:25:19
6 couple of housekeeping matters before we start. All 12:25:21
7 objections are reserved as to the form of the 12:25:24
8 question. 12:25:27

9 And I'll be identifying all the 12:25:28
10 participants representing the Defendants in this 12:25:31
11 case. My name Jae Lim, and I'm an Assistant Attorney 12:25:33
12 General for the Tennessee Attorney General's office. 12:25:37
13 And joining me today are my colleagues, Dianna Shew, 12:25:40
14 Sara Sedgwick, and Matt Jones. 12:25:46

15
16 * * *

17 L.G.,
18 was called as a witness and having first been duly
19 sworn, testified as follows:

20
21 EXAMINATION

22 QUESTIONS BY MR. LIM:

23 Q. Ms. L.G., how are you today? 12:25:51

24 A. I'm sorry, could you repeat that? I couldn't 12:25:55
25 hear. 12:25:58

1	Q.	How are you today?	12:25:59
2	A.	I'm doing well. Thank you.	12:26:00
3		MR. LIM: Brandt, could you go ahead and	12:26:05
4		identify all the attorneys representing the	12:26:07
5		Plaintiffs today?	12:26:10
6		MR. ROESSLER: I'd be glad to.	12:26:10
7		So I'm Brandt Thomas Roessler from Baker	12:26:10
8		Botts, representing the Plaintiffs. We also have on	12:26:15
9		the line John Winemiller, who is from Merchant &	12:26:17
10		Gould. And from Lambda Legal we have Omar	12:26:21
11		Gonzalez-Pagan, we have Sasha Buchert. I always	12:26:27
12		butcher that. Sorry, Sasha. And Tara Borelli.	12:26:32
13		BY MR. LIM:	12:26:40
14	Q.	Ms. L.G., have you ever been deposed before?	12:26:40
15	A.	No.	12:26:44
16	Q.	So I'm going to go over a couple of	12:26:49
17		preliminary matters that concern how depositions go	12:26:51
18		so that we're on the same page, okay?	12:26:56
19		Although this deposition is recorded --	12:27:03
20		although this deposition is on video, as Brandt	12:27:07
21		indicated earlier, we're not recording this	12:27:11
22		deposition. The only recording of this deposition	12:27:13
23		will be in the transcripts prepared by the court	12:27:16
24		reporter. So in order for Ms. Jeannie to accurately	12:27:20
25		record your responses and my questions, you need to	12:27:26

1 answer my questions affirmatively by saying yes or
2 no. If you motion -- you know, if you shake your
3 head or nod your head, that's not going to be noted
4 by the court reporter. Is that clear?

5 A. It's clear that I should not shake my head or
6 make gestures; that I should speak my responses.

7 Q. Yes, thank you.

8 And if you can't hear me or if you have a
9 difficult time understanding me, just simply ask me
10 to repeat the question or to rephrase my question.
11 I'll be happy to do that.

12 A. Thank you.

13 Q. And lastly please let me know at any point if
14 you'd like to take a break. I'm sure my colleagues
15 here would be happy to take a break at any time, too,
16 except for one instance. I would appreciate it if
17 you wait until you -- finish answering my question.
18 I would hate to ask the question and then for you
19 to -- you know, for us to take a break and have your
20 response hanging out there. Is that okay?

21 A. That is understood.

22 Q. Thank you.

23 Do you have any questions for me before
24 we start?

25 A. No.

1 Q. Okay. Could you state your name, full name 12:28:51
2 for the record, please? 12:28:56
3 A. . 12:28:56
4 Q. And have you used any other names in the 12:29:01
5 past? 12:29:09
6 A. I -- I've used my legal birth name and my 12:29:12
7 middle name. 12:29:19
8 Q. Which were? 12:29:22
9 A. I believe that's covered in the document. 12:29:27
10 Yes, all of those questions have been answered in the 12:29:41
11 documentation provided for the Court. 12:29:44
12 Q. Yeah, but I'm still asking you the question, 12:29:50
13 though. Do you know the previous names that you have 12:29:53
14 used in the past? 12:29:55
15 A. Yes. 12:29:58
16 Q. What are they? 12:29:59
17 A. Those are identified within the documents 12:30:08
18 that have been provided to the Court. 12:30:10
19 Q. All right. Let me move on. 12:30:16
20 What is your current address? 12:30:18
21 A. [REDACTED] 12:30:21
22 [REDACTED]. 12:30:28
23 Q. How long have you lived there? 12:30:31
24 A. I believe it's been about two years now. 12:30:35
25 Q. Where did you live before that? 12:30:40

1 A. I lived at an apartment in [REDACTED] 12:30:46
2 [REDACTED]. 12:30:49
3 Q. Have you always lived in [REDACTED]? 12:30:50
4 A. No. 12:30:54
5 Q. Where else have you lived in the past ten 12:30:56
6 years, if you could go back? 12:31:00
7 A. I have lived in the state of [REDACTED]. I 12:31:11
8 have lived in Tennessee. And I have lived in 12:31:15
9 [REDACTED]. 12:31:19
10 Q. When did you move to [REDACTED]? 12:31:21
11 A. It's about six years ago now. 12:31:25
12 Q. What brought you to [REDACTED]? 12:31:30
13 A. I was offered a promotion at my place of 12:31:36
14 work, and they had a position open here in 12:31:41
15 [REDACTED]. I applied to transfer and was granted 12:31:48
16 the promotion and the relocation. 12:31:53
17 Q. Where was your previous location? 12:31:55
18 A. Before that I lived and worked in [REDACTED] 12:31:58
19 Tennessee. 12:32:03
20 Q. And how long did you live in [REDACTED] 12:32:03
21 Tennessee? 12:32:05
22 A. Well, I was born in [REDACTED] Tennessee, and 12:32:12
23 I moved away for college and education. And then I 12:32:15
24 returned after graduation in [REDACTED], and I lived there 12:32:21
25 until I relocated here to [REDACTED]. 12:32:26

1 Q. Does your family still live in [REDACTED] 12:32:30
2 Tennessee? Your immediate family? 12:32:34
3 A. Yes. I do still have family in Tennessee and 12:32:38
4 family in [REDACTED]. 12:32:45
5 Q. Do you have any siblings? 12:32:47
6 A. Yes. 12:32:51
7 Q. How many? 12:32:55
8 A. [REDACTED] 12:33:02
9 Q. What are their ages? You don't have to name 12:33:05
10 them. Can you just identify them as brother, sister, 12:33:09
11 and their age? 12:33:12
12 MR. ROESSLER: Objection. 12:33:13
13 BY MR. LIM: 12:33:15
14 Q. You may answer. 12:33:15
15 A. [REDACTED] 12:33:19
16 [REDACTED] 12:33:26
17 Q. Are they all still in Tennessee? 12:33:33
18 A. To my knowledge, yes, they currently live and 12:33:41
19 reside in Tennessee. 12:33:43
20 Q. Do you still keep in touch with them? 12:33:46
21 MR. ROESSLER: Objection. 12:33:51
22 BY MR. LIM: 12:33:52
23 Q. You may answer. 12:33:52
24 A. I am close with my sisters. 12:34:03
25 Q. And not your brother? 12:34:10

1	MR. ROESSLER: Objection.	12:34:12
2	THE WITNESS: No.	12:34:13
3	BY MR. LIM:	12:34:16
4	Q. You mentioned earlier that your job -- your	12:34:16
5	promotion brought you to [REDACTED]. Who do you work	12:34:19
6	for?	12:34:23
7	A. I'm sorry, could you repeat that question?	12:34:25
8	The audio cut out.	12:34:27
9	Q. You mentioned earlier that a promotion at	12:34:30
10	your job brought you to [REDACTED]. Do you still work	12:34:32
11	there?	12:34:36
12	A. Do I still work in [REDACTED]?	12:34:39
13	Q. Do you still work for the same employer that	12:34:41
14	brought you to [REDACTED]?	12:34:44
15	A. No.	12:34:45
16	Q. Who do you work for now?	12:34:47
17	A. I work as an [REDACTED].	12:34:52
18	Q. Doing what?	12:34:57
19	A. [REDACTED].	12:35:00
20	Q. How long have you done that?	12:35:04
21	A. I began this position, I believe, in	12:35:11
22	[REDACTED].	12:35:14
23	Q. And before [REDACTED], who was	12:35:17
24	your employer?	12:35:20
25	A. That was [REDACTED].	12:35:25

1 Q. And how long were you at [REDACTED]? 12:35:33
2 A. It was about [REDACTED]. 12:35:37
3 Q. What prompted you to leave that position or 12:35:42
4 that employer? 12:35:47
5 A. I'm sorry, could you repeat that? 12:35:49
6 Q. Why did you become an [REDACTED]? 12:35:51
7 A. The [REDACTED] location here in [REDACTED] 12:35:57
8 [REDACTED] closed down in [REDACTED]. 12:36:03
9 Q. And before that, before [REDACTED], 12:36:07
10 did you work for anyone else? 12:36:11
11 A. Yes. 12:36:17
12 Q. Who did you work for and when? 12:36:19
13 A. I'm sorry, what -- that's a bit of a vague 12:36:25
14 question. What was -- what was the timeframe you're 12:36:31
15 referring to? 12:36:34
16 Q. Immediately before your employment with [REDACTED] 12:36:35
17 [REDACTED], who did you work for and for how 12:36:40
18 long? 12:36:46
19 A. That would be [REDACTED]. And that was a 12:36:46
20 little -- I want to say around four years. 12:36:57
21 Q. Any other jobs before that? 12:37:04
22 A. Yes. 12:37:08
23 Q. What were they? 12:37:12
24 A. I worked -- I began working in high school 12:37:19
25 and continued working through college at various jobs 12:37:26

1 before taking employment with [REDACTED].

12:37:40

2 Q. Okay. So [REDACTED] was your first job out
3 of college?

12:37:44

12:37:47

4 A. I worked as an [REDACTED] briefly
5 before working with [REDACTED]. And I also worked as

12:37:54

12:37:58

6 [REDACTED].

12:38:09

7 Q. You mentioned that you left Tennessee to go
8 to [REDACTED] for school. Was that for college?

12:38:18

12:38:20

9 A. I attended college in [REDACTED], yes.

12:38:24

10 Q. And what was the name of the institution?

12:38:31

11 A. [REDACTED].

12:38:35

12 Q. What did you study?

12:38:37

13 A. I studied [REDACTED]

12:38:43

14 [REDACTED].

12:38:51

15 Q. Did you get a degree from there?

12:38:54

16 A. Yes.

12:38:57

17 Q. When?

12:38:57

18 A. I graduated in [REDACTED].

12:38:59

19 Q. What was your degree?

12:39:08

20 A. The degree was a Bachelor's of Arts in

12:39:10

21 [REDACTED]

12:39:15

22 [REDACTED]

12:39:19

23 Q. Where did you go to high school?

12:39:19

24 A. I attended high school in the state of

12:39:23

25 [REDACTED].

12:39:27

1 Q. What was the name of the high school? 12:39:36
2 A. [REDACTED] 12:39:38
3 Q. What year did you graduate from there? 12:39:40
4 A. I graduated in [REDACTED]. 12:39:45
5 Q. Were you involved in any extracurriculars in 12:39:54
6 high school? 12:40:00
7 A. Yes. 12:40:00
8 Q. Would you describe them for us? 12:40:01
9 A. [REDACTED] 12:40:11
10 [REDACTED] 12:40:20
11 [REDACTED] 12:40:25
12 Q. Did you -- 12:40:34
13 A. Yes. 12:40:35
14 Q. Did you play any sports? 12:40:36
15 A. No. 12:40:39
16 Q. After college did you have any further 12:40:52
17 training or education? 12:40:56
18 A. I'm currently in graduate school. 12:41:03
19 Q. What for and where? 12:41:06
20 A. I attend [REDACTED] 12:41:12
21 [REDACTED], and I'm pursuing a Master of Arts in 12:41:20
22 [REDACTED]. 12:41:26
23 Q. Do you have any certification or specialty 12:41:26
24 training in anything other than your BA and your 12:41:28
25 current master's that you're pursuing? 12:41:33

1	MR. ROESSLER: Objection.	12:41:39
2	THE WITNESS: I'm sorry, I don't	12:41:40
3	understand the question.	12:41:42
4	BY MR. LIM:	12:41:45
5	Q. Strike that, please.	12:41:45
6	Ms. L.G., are you an expert on	12:41:51
7	distinction between, if any, sex and gender?	12:41:55
8	A. I'm not an expert.	12:42:04
9	Q. So you're not -- so you don't plan to offer	12:42:08
10	any expert testimony on that distinction in this	12:42:13
11	lawsuit or in this deposition today, correct?	12:42:17
12	A. I'm not an expert. I'm a Plaintiff in this	12:42:22
13	case.	12:42:26
14	Q. Okay. Are you married?	12:42:26
15	A. No.	12:42:33
16	Q. Have you ever been married?	12:42:34
17	A. No.	12:42:38
18	Q. Do you plan to get married at some point?	12:42:40
19	MR. ROESSLER: Objection.	12:42:45
20	THE WITNESS: I don't know. I couldn't	12:42:49
21	speculate on that.	12:42:51
22	BY MR. LIM:	12:42:55
23	Q. Are you seeing anybody right now?	12:42:55
24	MR. ROESSLER: Objection.	12:42:58
25	THE WITNESS: I'm not sure what you mean	12:43:02

1	by the question.	12:43:04
2	BY MR. LIM:	12:43:04
3	Q. Are you dating anyone right now?	12:43:04
4	MR. ROESSLER: Objection.	12:43:07
5	BY MR. LIM:	12:43:11
6	Q. Are you --	12:43:11
7	A. No.	12:43:12
8	Q. -- in a romantic relationship with anyone	12:43:13
9	right now?	12:43:16
10	MR. ROESSLER: Objection.	12:43:17
11	THE WITNESS: No.	12:43:19
12	BY MR. LIM:	12:43:19
13	Q. Have you ever had a romantic relationship	12:43:19
14	with anyone else?	12:43:26
15	MR. ROESSLER: Objection.	12:43:27
16	THE WITNESS: Yes.	12:43:31
17	BY MR. LIM:	12:43:39
18	Q. When was the most recent one, and how long	12:43:39
19	did that relationship last?	12:43:43
20	MR. ROESSLER: Objection.	12:43:48
21	THE WITNESS: I'm sorry, but I don't -- I	12:43:52
22	don't understand the question. It's very vague.	12:43:54
23	BY MR. LIM:	12:43:58
24	Q. Let me rephrase.	12:43:58
25	Have you ever had a boyfriend or a	12:44:00

1 girlfriend in the past? 12:44:10

2 MR. ROESSLER: Objection. 12:44:14

3 THE WITNESS: Yes. 12:44:24

4 BY MR. LIM: 12:44:27

5 Q. When was the last time you had a boyfriend or 12:44:27

6 a girlfriend? 12:44:30

7 MR. ROESSLER: Objection. 12:44:34

8 THE WITNESS: I'm not sure about the 12:44:40

9 timeframe on that. 12:44:42

10 BY MR. LIM: 12:44:48

11 Q. Ms. L.G., do you date men or women? 12:44:48

12 MR. ROESSLER: Objection. 12:44:54

13 THE WITNESS: I identify as a lesbian. 12:45:07

14 BY MR. LIM: 12:45:09

15 Q. As a what? Pardon me. I didn't hear you. 12:45:09

16 A. I identify as a lesbian. 12:45:12

17 Q. Do you do any volunteer work? 12:45:19

18 A. Yes. 12:45:25

19 Q. What type of volunteer work do you do? 12:45:27

20 A. I volunteer often with my church. 12:45:34

21 Q. What church is that? 12:45:41

22 A. I attend [REDACTED] 12:45:46

23 [REDACTED]. 12:45:53

24 Q. What kind of volunteer work do you do with 12:45:55

25 the church? 12:45:57

1 A. I support church activities, [REDACTED] 12:46:02
2 [REDACTED] 12:46:07
3 Q. Do you do any volunteer work for the 12:46:13
4 transgender community? 12:46:20
5 A. Yes. 12:46:22
6 Q. Can you describe them for us? 12:46:27
7 A. Who are you asking about? 12:46:35
8 Q. You mentioned that you've done volunteering 12:46:38
9 work for transgender communities. Can you describe 12:46:41
10 to us what organizations you volunteer with, what 12:46:50
11 types of activities that you do? 12:46:53
12 MR. ROESSLER: Objection. 12:46:56
13 THE WITNESS: That's a very vague 12:47:04
14 question. 12:47:06
15 BY MR. LIM: 12:47:10
16 Q. Okay. I'll rephrase. 12:47:10
17 Are you a member of any organization that 12:47:11
18 advocates for the transgender community? 12:47:20
19 MR. ROESSLER: Objection. 12:47:24
20 THE WITNESS: I'm not sure how membership 12:47:31
21 would be defined. 12:47:33
22 BY MR. LIM: 12:47:38
23 Q. Do you volunteer or contribute money to any 12:47:38
24 organization that does that? 12:47:42
25 MR. ROESSLER: Objection. 12:47:46

1	Sorry.	12:47:46
2	THE WITNESS: That does what?	12:47:50
3	BY MR. LIM:	12:47:52
4	Q. That advocates for issues related to	12:47:52
5	transgender persons in the community.	12:47:59
6	MR. ROESSLER: Same objection.	12:48:01
7	THE WITNESS: I'm sorry, but I still	12:48:05
8	don't really understand the question.	12:48:07
9	BY MR. LIM:	12:48:18
10	Q. Do you do any volunteer work -- do you spend	12:48:18
11	any time working for or advocating for issues related	12:48:21
12	to transgender persons or the community?	12:48:28
13	MR. ROESSLER: Objection.	12:48:35
14	THE WITNESS: Could you repeat that?	12:48:46
15	BY MR. LIM:	12:48:54
16	Q. Yes, I may. Give me one second.	12:48:54
17	Have you attended any public events like	12:49:05
18	the gay parade or Pride Festival? Ever been to such	12:49:08
19	events like that?	12:49:16
20	MR. ROESSLER: Objection.	12:49:17
21	THE WITNESS: I'm not sure what you mean	12:49:34
22	by the gay parade.	12:49:36
23	BY MR. LIM:	12:49:41
24	Q. Gay parade -- I'm sorry, a parade like at	12:49:41
25	Pride Festival.	12:49:48

1	MR. ROESSLER: Same objection.	12:49:48
2	THE WITNESS: Have I -- have I attended	12:49:50
3	events like a Pride Festival?	12:49:53
4	BY MR. LIM:	12:49:56
5	Q. Yes.	12:49:56
6	A. Is that what you're asking?	12:49:57
7	Q. Yes.	12:49:59
8	A. Yes.	12:50:00
9	Q. Are you friends with any -- let me rephrase	12:50:00
10	that.	12:50:04
11	Do you know of any other transgender	12:50:06
12	persons?	12:50:09
13	MR. ROESSLER: Objection.	12:50:11
14	THE WITNESS: That's a very vague	12:50:16
15	question.	12:50:17
16	BY MR. LIM:	12:50:18
17	Q. No, it's not. I asked you if you know of any	12:50:18
18	other transgender persons in your life.	12:50:22
19	MR. ROESSLER: Same objection.	12:50:28
20	THE WITNESS: You asked me if I know of	12:50:30
21	any transgender persons, and then you asked me if I	12:50:31
22	know of any transgender persons in my life?	12:50:36
23	BY MR. LIM:	12:50:40
24	Q. Yes.	12:50:40
25	A. Which -- which of those questions should I	12:50:43

1	answer?	12:50:48
2	Q. Whichever one you think is less vague.	12:50:49
3	MR. ROESSLER: Objection.	12:50:54
4	THE WITNESS: I'm sorry, but I'm not sure	12:51:00
5	how to respond.	12:51:03
6	BY MR. LIM:	12:51:04
7	Q. Okay. Are you friends with anyone who is	12:51:04
8	transgender?	12:51:07
9	MR. ROESSLER: Objection.	12:51:07
10	BY MR. LIM:	12:51:10
11	Q. Do you want me to define friendship for you?	12:51:10
12	A. I do have friends who identify as	12:51:18
13	transgender.	12:51:21
14	Q. How did you meet them?	12:51:22
15	A. I have met some of my friends through support	12:51:32
16	groups, through educational communities, and through	12:51:37
17	personal contact.	12:51:45
18	Q. And do you do any volunteer work with those	12:51:49
19	organizations?	12:51:54
20	MR. ROESSLER: Objection.	12:51:58
21	THE WITNESS: What organizations are you	12:52:06
22	referring to?	12:52:07
23	BY MR. LIM:	12:52:07
24	Q. The support groups that you just mentioned.	12:52:07
25	A. As far as I can recall, I don't think I have	12:52:26

1 taken on a position of volunteer in an official 12:52:31
2 capacity with the support groups that I was referring 12:52:42
3 to, but I can't be sure. 12:52:46
4 Q. I'll move on. 12:52:52
5 Do you have any social media? 12:52:53
6 MR. ROESSLER: Objection. 12:52:58
7 THE WITNESS: Not often. 12:53:04
8 BY MR. LIM: 12:53:07
9 Q. Do you have Facebook? 12:53:07
10 A. Yes. 12:53:12
11 Q. Do you identify yourself as a transgender 12:53:16
12 person on Facebook? 12:53:23
13 A. I'm sorry, but in what capacity? 12:53:39
14 Q. Do you identify yourself as a woman on 12:53:45
15 Facebook? 12:53:48
16 MR. ROESSLER: Objection. 12:53:50
17 THE WITNESS: Absolutely, yes. 12:53:51
18 BY MR. LIM: 12:53:53
19 Q. And do you identify yourself as a woman on 12:53:53
20 other social media, if any? 12:53:56
21 A. I identify as woman in all aspects of my 12:54:02
22 life. 12:54:06
23 Q. Okay. Thank you. 12:54:06
24 Did you review any documents in 12:54:12
25 preparation for this deposition? 12:54:14

1	A.	Yes.	12:54:18
2	Q.	What were they?	12:54:20
3	A.	I have reviewed the Amended Complaint for	12:54:29
4		Declaration for Declaratory and Injunctive Relief,	12:54:34
5		the Declaration of L.G. in Support of Plaintiffs'	12:54:40
6		Motion for Summary Judgment, and Plaintiff L.G.'s	12:54:43
7		Responses and Objections to Defendants' First Set of	12:54:45
8		Interrogatories.	12:54:49
9	Q.	Okay. Did you speak with anyone about your	12:54:49
10		deposition today?	12:54:51
11	A.	Yes.	12:54:57
12	Q.	Who did you speak with?	12:54:59
13	A.	I have been in communication with my legal	12:55:07
14		team regarding today's deposition.	12:55:11
15	Q.	Anyone else outside of your legal team?	12:55:14
16		MR. ROESSLER: Objection.	12:55:18
17		THE WITNESS: I believe that I have	12:55:29
18		identified people with knowledge concerning the case	12:55:33
19		in the documents mentioned.	12:55:35
20		BY MR. LIM:	12:55:38
21	Q.	The documents you mentioned talk about the	12:55:38
22		complaint. It doesn't talk about the deposition. My	12:55:42
23		question to you was, have you spoken with anyone	12:55:45
24		outside of your legal team about today's deposition?	12:55:48
25	A.	The people who have been made aware of my	12:55:56

1 involvement in the case have been named in the 12:56:03
2 documentation. 12:56:05

3 Q. Are you -- are you refusing to answer my 12:56:07
4 question? 12:56:12

5 A. No. I'm sorry, could you repeat your 12:56:14
6 question? 12:56:16

7 Q. I asked you if you have spoken with anyone 12:56:19
8 outside of your legal team about today's deposition. 12:56:22

9 A. I will refer to the documents. [REDACTED] 12:56:33

10 [REDACTED] 12:56:42

11 [REDACTED] 12:56:51

12 [REDACTED] 12:56:56

13 Q. About today's deposition? 12:57:00

14 A. Yes. 12:57:05

15 Q. Have you spoken to or made -- let me 12:57:12
16 rephrase. 12:57:16

17 Have you spoken to or met any of the 12:57:16
18 other Plaintiffs in this litigation? 12:57:19

19 A. No. 12:57:23

20 Q. Who knows of your transgender status? 12:57:38

21 MR. ROESSLER: Objection. 12:57:43

22 THE WITNESS: I'm not sure how to answer 12:57:57
23 that question. 12:57:58

24 BY MR. LIM: 12:57:59

25 Q. Okay. I'll break it down. 12:57:59

1 Does your family know that -- does your 12:58:01
2 family know of your status as a transgender woman? 12:58:04
3 MR. ROESSLER: Objection. 12:58:08
4 THE WITNESS: I'm not sure how to answer 12:58:14
5 that. 12:58:16
6 BY MR. LIM: 12:58:17
7 Q. Do your parents know? 12:58:17
8 A. My mother knows that I'm a trans woman. And 12:58:24
9 my father passed away [REDACTED] 12:58:33
10 [REDACTED] 12:58:40
11 Q. I'm sorry to hear that. 12:58:43
12 Do your siblings know? 12:58:46
13 A. Yes. 12:58:53
14 Q. Do your colleagues know? 12:58:56
15 MR. ROESSLER: Objection. 12:58:59
16 THE WITNESS: What -- what colleagues are 12:59:02
17 you referring to? 12:59:04
18 BY MR. LIM: 12:59:05
19 Q. The previous colleagues at [REDACTED] 12:59:05
20 [REDACTED]. 12:59:09
21 A. Co-workers at [REDACTED]? 12:59:11
22 Q. Yes. 12:59:16
23 A. I'm not sure if I can speculate on knowledge 12:59:21
24 that people possess. 12:59:26
25 Q. Did you tell anyone -- tell any of your 12:59:28

1 co-workers about your status as a trans woman? 12:59:33

2 A. I have came out to my friend, [REDACTED] 12:59:41

3 [REDACTED] -- 12:59:50

4 Q. When was -- 12:59:50

5 A. -- while we were working at [REDACTED]. 12:59:51

6 Q. When did you come out to her? 12:59:58

7 A. That was around August of 2016, I believe. 01:00:02

8 Q. Was that at your school, where you are 01:00:17

9 attending school now? 01:00:25

10 MR. ROESSLER: Objection. 01:00:26

11 THE WITNESS: I'm sorry, could you repeat 01:00:27

12 that? 01:00:29

13 BY MR. LIM: 01:00:30

14 Q. Have you told anyone at your current school, 01:00:30

15 where you're obtaining your master's, of your status 01:00:35

16 as a transgender woman? 01:00:38

17 A. Yes. 01:00:41

18 Q. Who are they? 01:00:46

19 A. I have informed some of my classmates and my 01:00:54

20 immediate cohorts, the professors that I have had, 01:01:02

21 and the director of admissions. 01:01:11

22 Q. Okay. Thank you. 01:01:15

23 When did you first identify yourself as a 01:01:18

24 transgender woman? 01:01:21

25 MR. ROESSLER: Objection. 01:01:37

1	THE WITNESS: I'm not sure how to answer	01:01:38
2	that question.	01:01:39
3	BY MR. LIM:	01:01:46
4	Q. When was -- when was the first time that you	01:01:46
5	can recall that you realized that you are a woman and	01:01:49
6	not a man?	01:01:54
7	MR. ROESSLER: Objection.	01:02:05
8	THE WITNESS: Most of my earliest	01:02:12
9	memories are of discomfort with gender roles and	01:02:13
10	expectations that were placed on me.	01:02:25
11	BY MR. LIM:	01:02:40
12	Q. So you don't know?	01:02:40
13	MR. ROESSLER: Objection.	01:02:43
14	THE WITNESS: I'm sorry, what are you	01:02:48
15	asking?	01:02:50
16	BY MR. LIM:	01:02:51
17	Q. I asked you when was the first time that you	01:02:51
18	can recall that you realized that you are a woman,	01:02:53
19	not a man.	01:02:57
20	MR. ROESSLER: Same objection.	01:03:00
21	THE WITNESS: I'm not sure.	01:03:05
22	BY MR. LIM:	01:03:07
23	Q. Okay. Who was the first person that you	01:03:07
24	told?	01:03:11
25	MR. ROESSLER: Objection.	01:03:14

1	BY MR. LIM:	01:03:21
2	Q. Let me rephrase.	01:03:21
3	Who was the first person that you came	01:03:22
4	out to?	01:03:24
5	MR. ROESSLER: Objection.	01:03:25
6	THE WITNESS: The first person that I	01:03:26
7	came out to in what capacity?	01:03:27
8	BY MR. LIM:	01:03:30
9	Q. Came out to as a trans woman.	01:03:30
10	A. I believe that was my mother.	01:03:49
11	Q. When was that?	01:03:51
12	A. I think that was 2004.	01:04:05
13	Q. How old were you?	01:04:08
14	A. [REDACTED]	01:04:16
15	Q. I want to refer you to what's been previously	01:04:27
16	marked as Exhibit 1. That would be the amended	01:04:31
17	complaint. Ms. L.G., could you go to page 25?	01:04:34
18	That's where the facts as it relate to you begin.	01:04:46
19	So I want to direct your attention to	01:04:56
20	paragraph 125.	01:04:58
21	"From a young age, L.G. has identified as	01:05:00
22	female. L.G. first attempted to come out as	01:05:04
23	transgender and live openly as a girl while in high	01:05:09
24	school, but she experienced negative reactions from	01:05:12
25	her community."	01:05:15

1	Could you please describe to us what	01:05:21
2	those negative reactions were?	01:05:23
3	A. Sorry. Some of this is difficult to talk	01:05:37
4	about.	01:05:39
5	Q. I know. I apologize. But I have to ask	01:05:41
6	these questions because we're trying to learn as much	01:05:44
7	data about the facts that you have alleged in the	01:05:49
8	amended complaint. I know these are very personal	01:05:53
9	and uncomfortable questions. And you have to	01:05:55
10	remember, I'm -- I'm just trying to do my job. And I	01:06:00
11	respect that it's very difficult.	01:06:03
12	So if you need to take a break, I'll be	01:06:07
13	happy to do that. But I'm going to have ask you some	01:06:10
14	of these questions, okay?	01:06:18
15	A. I understand.	01:06:19
16	I had been grappling with my identity and	01:06:23
17	was coming to the realization that I was a trans	01:06:32
18	woman. I had never identified with being a male.	01:06:40
19	And I had always thought that I was female. And I	01:06:49
20	did not have the language or terminology to fully	01:06:54
21	understand or articulate my identity until high	01:07:00
22	school, when I understood that I was a trans woman.	01:07:08
23	I wanted to find access to medical care	01:07:17
24	in order to transition. And I told my mother that I	01:07:24
25	was trans and that I needed help and that I wanted to	01:07:35

1 see an endocrinologist because it felt like something
2 was wrong with my hormones. And the puberty was
3 hurting me in ways that no one else talked about or
4 described.

5 And my mother told me that you can be
6 gay, but you can't be that. She said that she didn't
7 care who I decided to date. If I wanted to date
8 people, that's fine. But that it was just a phase
9 and that I was confused and I didn't understand. And
10 she told me that she would not take me to see a
11 doctor and that I needed to stop thinking about it.

12 I told my girlfriend at the time that
13 something was wrong and that I was a woman and that I
14 was trans. And she said -- she said she didn't want
15 to be with me anymore because I was a freak; that
16 that was wrong.

17 And as I began to do what I could to
18 alleviate my dysphoria and attempted to change my
19 presentation, I was targeted and harassed. I had
20 always had effeminate behaviors when I was a child.
21 Hand gestures and ways of speaking and moving. And I
22 had been targeted for that in the past and harassed
23 and told to suppress these things. In high school I
24 attempted to stop holding my hands that way and to be
25 more open about how I moved and how I spoke. And I

1 was assaulted and harassed for it. So I decided that 01:10:18
2 I had to stop. And I needed to try to forget about 01:10:20
3 all of it. 01:10:24

4 Q. Thank you for that. Do you need a break? 01:10:34

5 A. I can continue. 01:10:47

6 Q. Okay. So I'd like to direct your attention 01:10:48
7 to the next paragraph, paragraph 126 of the amended 01:10:53
8 complaint. "By age 24, however, L.G. knew she needed 01:10:57
9 to be true to herself and began openly identifying as 01:11:01
10 female. Though L.G. had to, once again, come out to 01:11:06
11 her family, her parents were more supportive this 01:11:11
12 time." 01:11:15

13 Can you tell us a bit more about how 01:11:17
14 supportive your parents were when you came out near 01:11:19
15 24? 01:11:24

16 A. While I was in college, I had a suicide 01:11:32
17 attempt. And after surviving, I knew that my life 01:11:39
18 wouldn't be worth living unless I could be who I was. 01:11:53
19 My dysphoria and inability to openly identify and 01:11:59
20 present as a woman and to be recognized as a woman, 01:12:06
21 the anxiety and depression, were crushing. There 01:12:13
22 were often times where I could not leave the house. 01:12:19
23 It interfered with my life in dramatic ways. 01:12:25

24 I was -- I had many difficulties with -- 01:12:29
25 with work and with interpersonal relationships. It's 01:12:38

1 very difficult to be close to people whenever you 01:12:43
2 can't be authentic and have to put on a presentation 01:12:48
3 that doesn't match who you are. 01:12:57

4 Whenever I finally decided to be who I 01:13:05
5 was and to be -- to live into that fully and to be 01:13:09
6 okay and accept that, I also began seeking and found 01:13:16
7 medical treatment in my area. Qualified medical 01:13:23
8 treatment for the first time in my life. My -- as my 01:13:28
9 presentation -- as I was more accepting of my 01:13:35
10 presentation and my identity, my anxiety and my 01:13:40
11 depression started to lessen. And for the first time 01:13:47
12 in years, I felt like I could be happy and live a 01:13:52
13 productive life. 01:14:00

14 I was in close communication with my 01:14:05
15 mother during that time, and she immediately noticed 01:14:08
16 that something was different. We would have phone 01:14:13
17 conversations where we would visit sometimes once a 01:14:18
18 week or so, and she started commenting that I was 01:14:22
19 taking care of my appearance and that I looked 01:14:27
20 happier. 01:14:31

21 And one day she called me and she said -- 01:14:34
22 she said, something's wrong and I don't know what. 01:14:38
23 But I'm your mother, and I know something's going on. 01:14:42
24 I said, what do you mean? And she said -- she said, 01:14:45
25 you're not talking to me about your anxiety and 01:14:52

1 depression anymore. She said, you haven't talked 01:14:56
2 about wanting to kill yourself. And I said, no, 01:14:59
3 because I don't want to anymore. I said, I'm happy 01:15:04
4 now. And she was really surprised. And she said, 01:15:09
5 well, I don't know what's going on, but I'm really 01:15:12
6 glad that you're feeling better now, and I want to 01:15:17
7 know what's making you happy. I want to know what I 01:15:22
8 can continue doing to support you. 01:15:25

9 So it was around Christmas, and I went to 01:15:29
10 go visit her. And I told her that -- that I was 01:15:32
11 trans and that it's not something that just goes 01:15:43
12 away; that I needed medical treatment. And that I 01:15:46
13 had received proper medical care and that my 01:15:50
14 dysphoria was manageable. 01:15:58

15 And we had a long conversation about the 01:16:09
16 fears and misconceptions that she -- that she had 01:16:12
17 about what it meant to be trans and about what my 01:16:16
18 life would look like. And she had -- she had feared 01:16:19
19 and obsessed for a long time since my childhood about 01:16:28
20 what might happen; that I might be killed or that I 01:16:36
21 might kill myself or that she knew -- she knew that 01:16:41
22 there were dangers. And she knew about social 01:16:48
23 attitudes about people who are trans. She told me 01:16:53
24 that she worried. She didn't want me to be alone for 01:16:56
25 the rest of my life. And she wanted -- she just 01:16:59

1 wanted me to be happy.

01:17:05

2 And I said, well, you know this is who I
3 am. And I am happy. And I'm not asking for access
4 to medical care now like I was when I was in high
5 school and I came out to you then. But I am asking
6 for your love and support. I want you to be a part
7 of my life. And if -- if you can't do that, then
8 it's going to break my heart, but I'll have to
9 continue being who I am, because I can't be anybody
10 other than who I am anymore.

01:17:07

01:17:10

01:17:27

01:17:30

01:17:33

01:17:36

01:17:43

01:17:47

01:17:51

11 And she -- she told me that she loved me
12 and that it was going to be okay. And she ran into
13 the other room and grabbed all the presents out from
14 underneath the Christmas tree and marked out all --
15 she got a knife and carved out all the names -- the
16 old names on the presents, and she wrote my real name
17 on the presents.

01:17:53

01:17:58

01:18:03

01:18:08

01:18:08

01:18:15

01:18:19

18 And she asked me if I had -- if I had
19 taken a middle name yet. And I said, no, I wasn't
20 sure. And so she went and got our family Bible, and
21 we sat down and picked out my middle name from the
22 Bible.

01:18:20

01:18:26

01:18:29

01:18:33

01:18:37

23 Q. Thank you, Ms. L.G.

01:18:47

24 Your real name -- you had your name
25 legally changed to reflect your new name. And what

01:18:52

01:18:55

1	is that?	01:18:59
2	A. My name is .	01:19:01
3	Q. Of course, this will be redacted going	01:19:06
4	forward.	01:19:11
5	And when did you have that legally	01:19:12
6	changed?	01:19:17
7	A. I'm sorry, what?	01:19:17
8	Q. When did you legally change your name?	01:19:19
9	A. That was in early 2014.	01:19:23
10	Q. So that was before or after you came out to	01:19:27
11	your mom?	01:19:31
12	A. My legal name change was in 2014. And I came	01:19:37
13	out to my mother for the second time as a trans woman	01:19:47
14	in 2013.	01:19:50
15	Q. And after getting your name changed, you have	01:19:57
16	sought to update the name -- the given name on	01:20:04
17	several documentations, correct?	01:20:11
18	A. Yes.	01:20:15
19	Q. And starting with -- let me rephrase. Give	01:20:16
20	me one second, please.	01:20:28
21	MR. ROESSLER: Counselor, L.G., would	01:20:36
22	this be a good time to take a break or --	01:20:40
23	THE WITNESS: I'm all right.	01:20:45
24	BY MR. LIM:	01:20:46
25	Q. I'd like to direct your attention to	01:20:46

1 paragraph 133, on page 26. "Following her legal name
2 change, L.G. changed her name on her birth
3 certificate, but as a result of Tennessee's birth
4 certificate policy, was declined on several occasions
5 when she tried to correct the gender marker on her
6 certificate."

7 What -- what is Tennessee's birth
8 certificate policy, Ms. L.G.?

9 MR. ROESSLER: Objection.

10 THE WITNESS: I'm not sure I understand
11 what you mean by the question.

12 BY MR. LIM:

13 Q. Well, you alleged here in the amended
14 complaint that because of -- as a result of the
15 State's policy, you couldn't change the gender marker
16 on your birth certificate. So what is the policy as
17 you understand it?

18 MR. ROESSLER: Objection.

19 THE WITNESS: I'm sorry, but I'm not a
20 lawyer, and I'm not a legislator. All I know is that
21 the gender marker on my birth certificate is
22 incorrect. And I've tried to correct that several
23 times, and the State of Tennessee has not corrected
24 it.

25 ///

1	BY MR. LIM:	01:22:20
2	Q. Why do you think that the gender marker is	01:22:20
3	incorrect?	01:22:24
4	MR. ROESSLER: Objection.	01:22:27
5	THE WITNESS: It says male, and I'm not	01:22:32
6	male. I'm female.	01:22:37
7	BY MR. LIM:	01:22:44
8	Q. Can you think of any reason why the gender	01:22:44
9	marker on your birth certificate was listed as male	01:22:49
10	at the time of your birth?	01:22:53
11	MR. ROESSLER: Objection.	01:22:55
12	THE WITNESS: I couldn't really speculate	01:23:02
13	on why it was marked incorrectly.	01:23:05
14	BY MR. LIM:	01:23:24
15	Q. Do you think it had anything to do with the	01:23:24
16	external genitalia -- your external genitalia at the	01:23:32
17	time of birth?	01:23:38
18	MR. ROESSLER: Objection.	01:23:39
19	THE WITNESS: I'm not sure.	01:23:40
20	BY MR. LIM:	01:24:08
21	Q. Give me one second.	01:24:08
22	Moving on to 137, page 27 at the top,	01:24:14
23	"L.G. reasonably fears that possessing a birth	01:24:19
24	certificate that fails to reflect her female gender	01:24:28
25	identity increases the likelihood that she will be	01:24:29

1 subjected to invasions of privacy, prejudice,
2 discrimination, distress, harassment, or violence."

3 Has there ever been a time where not
4 having a corrected birth certificate that reflects
5 your gender -- current gender identity has subjected
6 you to invasions of privacy, prejudice,
7 discrimination, distress, harassment, or violence?

8 MR. ROESSLER: Objection.

9 THE WITNESS: I'm sorry, that's very
10 broad. I have experienced -- I have experienced
11 discrimination and hostility and violence. And there
12 have been instances where the discrimination has --
13 has been directly related to the incongruent
14 documents.

15 BY MR. LIM:

16 Q. Can you describe in detail what those
17 instances were?

18 A. There have been many different instances of
19 hostility and discrimination and violence when I
20 presented my name change at the Social Security
21 office to have my name and gender marker changed.
22 They updated the name, but they said that the letters
23 that I had were not adequate for the change in gender
24 marker.

25 I waited for hours to see a clerk, and

1 they would not tell me what I needed in order to 01:27:04
2 satisfy the requirement for the gender marker change. 01:27:10
3 They would not show me the documentation. They just 01:27:14
4 told me that the letter from my doctor I had was 01:27:18
5 wrong. 01:27:24

6 So I had to go back to my doctor's office 01:27:25
7 and get a new letter. They told me that I had to 01:27:27
8 have the physician -- more of the physician's details 01:27:34
9 posted on the letter. So I went to the doctor's 01:27:39
10 office, and they changed the letter and said they 01:27:42
11 never had to do something like that before. 01:27:45

12 And I went back to the Social Security 01:27:47
13 office, and I waited again for hours to see someone. 01:27:48
14 And when I did, I explained what was going on and 01:27:54
15 gave them the letter. And they told me that the 01:27:59
16 letter was still incorrect and that they weren't 01:28:02
17 allowed to change it. And I asked them what 01:28:05
18 correction needed to be made. Because if no one 01:28:10
19 would show me how to do it or what the requirements 01:28:15
20 were, then how could I be expected to make sure that 01:28:19
21 the documentation was accurate? 01:28:24

22 And the clerk who was there said that he 01:28:25
23 had transferred in, and he said that it's ridiculous 01:28:28
24 that this was a big issue; and that all of these -- 01:28:34
25 all of these things should be easy to change. And he 01:28:41

1 showed me the documentation of what the letter should 01:28:45
2 look like and pointed it out and told me what I 01:28:48
3 needed to have corrected. 01:28:52

4 So I went to my doctor's office again, 01:28:53
5 and they corrected the letter. And brought it back 01:28:55
6 for him. It took me longer to see someone. But I 01:29:00
7 gave him the letter, and he said that it was 01:29:05
8 acceptable and changed my documentation. 01:29:08

9 After I corrected my Social Security 01:29:14
10 marker, they gave me a letter that said that all of 01:29:16
11 that had been updated. And I took that information 01:29:21
12 to the DMV located out at Strawberry Plains in 01:29:24
13 Tennessee. And I showed the documentation to the 01:29:32
14 clerk who was working at the DMV. 01:29:42

15 I showed him my name change and my birth 01:29:50
16 certificate and the letter from the Social Security 01:29:53
17 office. And he said, well, I can change the name, 01:29:58
18 but I'm not going to change the gender marker. And I 01:30:03
19 asked him -- I asked him why, and he said, well, have 01:30:07
20 you -- do you have the correct documentation? And I 01:30:14
21 asked him what the correct documentation was. And he 01:30:18
22 said, I need a corrected birth certificate. I need 01:30:23
23 an amended birth certificate that states that you 01:30:30
24 are -- that you are female or a letter from the 01:30:34
25 surgeon. 01:30:38

1	And he asked me if I had had the surgery.	01:30:40
2	And I said, I wasn't sure what qualified as "the	01:30:43
3	surgery." And he started describing genitals to me.	01:30:47
4	And I said, I don't have any kind of letter from a	01:30:54
5	surgeon, but I have my letter from my doctor's	01:31:01
6	office. And I'm a woman. I shouldn't have to show	01:31:04
7	anybody my body in order to receive a driver's	01:31:10
8	license that's correct.	01:31:18
9	And then he said -- he said, well, you're	01:31:22
10	going to have to provide some kind of documentation.	01:31:33
11	And I said, can I see -- can I see where it says	01:31:36
12	that? Can you show me the guidelines? And he told	01:31:39
13	me that I was going to have to wait for a supervisor.	01:31:44
14	So he went and found the supervisor, and	01:31:47
15	the supervisor came out. And I said, I want to see	01:31:50
16	where it said what I had to have to be able to change	01:31:55
17	my gender marker on my driver's license.	01:31:59
18	The supervisor went back to the office	01:32:02
19	and got a book. And it took probably about 15 to 20	01:32:04
20	minutes before the supervisor came back with the	01:32:08
21	book. And the supervisor read to me out of the book.	01:32:11
22	And I asked if I could have a copy so that I knew	01:32:14
23	what I needed to do. And the supervisor said no. So	01:32:19
24	I said, well, can I read it? Can I see what it says?	01:32:24
25	And I've got some paper here in my purse, can I write	01:32:30

1 down what it says that I need, so that I know what to
2 do? And the supervisor said, no, that I wasn't
3 allowed to see it and write things down like that.

4 So I -- I asked if I could just read it
5 for myself so I knew that it said that. And the
6 supervisor put the book down on the counter and
7 pushed it toward me but held onto it like I -- like I
8 was going to steal it or something.

9 And so I had to read what it said. And
10 it said that I needed an updated birth certificate or
11 a letter from a surgeon that said I had sexual
12 reassignment and that my transition was complete.
13 And it said I had to have a court order.

14 And I said, they told me at the clerk's
15 office whenever I was -- whenever I asked about my
16 birth certificate, they told me they won't change
17 anything. They said they don't do that here. And
18 they wouldn't tell me any ways that I could fix it.
19 So I didn't know what to do. And they said that's
20 not our problem.

21 So I had to take a picture of my driver's
22 license. And I had been crying. And that wasn't the
23 first time that I had a driver's license where I had
24 to clean up my eyes after crying. Because it kept
25 happening. I had my driver's license and it has the

1 right name on it, but it still has the wrong gender
2 marker. And it was supposed to be a really exciting
3 moment where I finally had documentation that
4 reflected who I was, but it was still wrong.

5 And I was so ashamed. I didn't want to
6 show anybody my license. There were times when I had
7 to and people would stare at me or people would
8 comment on it, and they would say things like, you
9 know this is wrong, right? You know somebody made a
10 mistake on this. And I just had to say, yeah, I
11 know. I know somebody made a mistake, because they
12 won't fix it.

13 Q. I apologize that you had to experience that.
14 And I think we can all agree that people at the DMV,
15 they really need some training on sensitivity and --

16 THE REPORTER: I'm sorry to interrupt,
17 but I'm getting some feedback on your comments.
18 Could you repeat that?

19 BY MR. LIM:

20 Q. I said I'm really sorry that you had to
21 experience that. And I think we can all agree that
22 people at the DMV could use some significant training
23 on sensitivity and how to be a good, decent human
24 being in 2020.

25 To be -- should we take a break here?

1 Ms. LG, do you need a break? 01:36:37

2 A. I think I can continue for a little while. 01:36:43

3 Q. Okay. Ms. LG, I'd like to bring your 01:36:46
4 attention to paragraph 137, where you say that you 01:36:56
5 reasonably fear that possessing a birth certificate 01:37:04
6 that fails to reflect your female gender marker 01:37:08
7 increases the likelihood that you would be subject to 01:37:18
8 invasions of privacy, prejudice, discrimination, 01:37:23
9 distress, harassment, and violence. But the 01:37:27
10 instances that you just mentioned didn't involve the 01:37:36
11 birth certificate in any way, no? 01:37:39

12 MR. ROESSLER: Objection. 01:37:44

13 THE WITNESS: When I presented my birth 01:37:51
14 certificate along with all of my documentation and 01:37:54
15 tried to use the documentation to change the gender 01:38:00
16 marker on my driver's license, it was denied. There 01:38:03
17 were other -- there were other experiences -- similar 01:38:16
18 experiences at other DMVs. And there were 01:38:25
19 experiences dealing with law enforcement and medical 01:38:27
20 providers. 01:38:31

21 BY MR. LIM: 01:38:39

22 Q. Do you carry your birth certificate with you? 01:38:39

23 A. I keep my birth certificate locked in a 01:38:46
24 safety deposit box. And it's sealed in an envelope 01:38:51
25 so that no one will ever see it. And my mom is the 01:38:58

1 only other person with a key, and she is supposed to
2 destroy it if I die.

3 Q. I want to direct your attention to paragraph
4 138. It mentions that you've experienced firsthand
5 hostility, discrimination, and harassment that
6 transgender people often experience when presenting
7 identification that conflicts with their gender. And
8 you've described, I think, some of those instances
9 just now.

10 Are there any other instances that you
11 can think of where you've presented your
12 identification and you were subjected to hostility,
13 discrimination, and harassment?

14 MR. ROESSLER: Objection.

15 THE WITNESS: Whenever I moved to
16 [REDACTED], I needed a new driver's license. And I --
17 I went to the DMV and I presented my documentation.
18 And I told -- I told the person that I needed to
19 correct my gender marker, as well as to have a
20 [REDACTED] driver's license.

21 And the clerk -- the clerk told me that I
22 needed a birth certificate -- a corrected birth
23 certificate or a letter from a surgeon. And I said,
24 I have a doctor's letters. Like, my current
25 physician had written a letter that -- that I'm

1 female; that I needed my gender markers changed. 01:41:25

2 And they said, we're going to need to get 01:41:32
3 a supervisor. And we'll fax everything off and see 01:41:34
4 if it gets approved, but I don't think this is -- 01:41:39
5 this is going to work. It would be a lot easier if 01:41:43
6 you could just give me a birth certificate. And I 01:41:46
7 said, I really wish that I could, but I don't have -- 01:41:48
8 the State of Tennessee won't correct it. I tried. 01:41:55

9 And so the supervisor went in the other 01:42:01
10 office and had the assistant supervisor there. And 01:42:04
11 they told me to sit down. And then they asked me if 01:42:10
12 I had undergone any surgery. And I asked them what 01:42:15
13 they meant by surgeries. And they asked me if I had 01:42:21
14 a vagina. And they made suggestive comments. And 01:42:29
15 I -- I said that I shouldn't have to be forced to 01:42:47
16 have a surgery to have identity documents that match 01:42:51
17 who I am. 01:42:57

18 And they said, well, we feel really bad 01:43:00
19 for you and everything, but we're not going to fix 01:43:07
20 this until you come back with a letter from a surgeon 01:43:11
21 or a birth certificate. So they sent me back out and 01:43:17
22 closed the door. 01:43:24

23 And I had to go back to the clerk, and 01:43:25
24 the clerk said, if you have a passport, I think I 01:43:28
25 could use a passport, too. So I -- I -- I took all 01:43:33

1 my identity documents back, and they gave me a 01:43:43

2 [REDACTED] driver's license that still has the 01:43:46

3 incorrect marker on it. And I had to take that and 01:43:49

4 use that on several occasions again. 01:43:54

5 It was so shameful to pull that out and 01:43:58

6 have people ask me questions about my driver's 01:44:04

7 license being wrong. I had to present it whenever I 01:44:07

8 was hired at [REDACTED]. And I was really worried 01:44:18

9 that I wouldn't get a job and that they were going to 01:44:21

10 scan that and put it on my file and then everybody 01:44:25

11 would see it. 01:44:28

12 I went to the doctor's office one time at 01:44:34

13 a new doctor. And I'd asked my general practice 01:44:37

14 doctor if they were -- if they had trans patients, if 01:44:41

15 they were friendly. And my doctor said, yeah, I 01:44:46

16 think that everybody there should know and know how 01:44:51

17 to treat people who are trans. 01:44:56

18 So I -- I went. And whenever I was 01:45:00

19 having to pay my co-pays, the person at the desk 01:45:06

20 looked at my -- looked at my ID and sent everything 01:45:09

21 off and called me -- called me back up to the desk 01:45:15

22 and started talking to me about how my documents 01:45:22

23 didn't match and how the insurance company wasn't 01:45:25

24 sure what was going on, because the insurance company 01:45:27

25 had down that I was female and my driver's license 01:45:30

1 didn't match. And she was talking to me in front of 01:45:34
2 a whole bunch of people in the room. And that's when 01:45:40
3 they started to turn around and watch and listen. 01:45:45

4 And I felt really threatened. I felt 01:45:48
5 scared that people were going to follow me out to the 01:45:52
6 car or try to hurt me. Because I've seen all the 01:45:55
7 things about what happens to -- some of the things 01:45:58
8 that can happen. 01:46:03

9 And whenever I sent everything off to get 01:46:04
10 a passport, I sent all my documentation off. I sent 01:46:19
11 me birth certificate and a letter explaining that it 01:46:25
12 was incorrect and that I couldn't get it changed; 01:46:29
13 that I tried, and it hadn't been changed. And I was 01:46:33
14 really worried that something was going to happen or 01:46:38
15 my passport was going to be denied or that it was 01:46:41
16 going to be wrong. 01:46:45

17 But when I finally got my passport back, 01:46:46
18 it had the correct gender marker on it. And I 01:46:50
19 whipped up some courage to go back to the DMV. And I 01:47:00
20 went up to the desk whenever I was called, and there 01:47:05
21 was a lady standing at the desk. And she was in a 01:47:08
22 good mood. And we -- I said hello. And I asked her 01:47:15
23 how her day was. And she smiled, and we talked for a 01:47:19
24 minute. 01:47:25

25 And she asked me what she could do to 01:47:25

1 help. And I said that I needed to -- I showed her my
2 driver's license. And I said, I've changed -- I've
3 changed addresses, and I need to update my driver's
4 license. And she looked at it, and she said -- she
5 started laughing, and she said, I've never seen this
6 before. Somebody made a mistake on your driver's
7 license. It says that you're a male. She said, wow,
8 we need to fix that. I don't know how that could
9 have happened. And I said, I know. I've been trying
10 to get it fixed for years. And I said, I have a
11 passport here. And she said, well, I need a birth
12 certificate. That's the easiest way to do it. And I
13 said, I don't have one. The State of Tennessee won't
14 change mine. I'm a trans woman.

15 And she stopped making eye contact with
16 me and backed away from the counter like I was going
17 to attack her. And she stopped talking to me. And
18 she walked away, and she went and found her
19 supervisor. And her supervisor came over and asked
20 what was going on. And I said -- I said I needed to
21 change my gender marker and update my driver's
22 license and that I had a passport. And they said, we
23 need a birth certificate or a letter from a surgeon.

24 And I grabbed all my documents, and I ran
25 out and started crying in the parking lot because I

1 was so frustrated and ashamed.

01:49:21

2 It took me -- it took me a while to end
3 up going back to a DMV. And I decided trying to go
4 to a different DMV. And it was after I had had
5 surgery. And I didn't want to present a letter from
6 the surgeon. I wanted them to just give me the right
7 documentation.

01:49:33

01:49:39

01:49:44

01:49:50

01:49:58

01:50:09

8 And I went in and I talked to the clerk
9 and said that my driver's license needed to be
10 corrected. And the clerk said -- and the clerk said
11 if I had a birth certificate or a letter from a
12 surgeon, that would be fine. And I said, someone
13 told me that a passport would be fine. I said, I
14 have all my documentation here, and I have a letter
15 from a surgeon, and I was told that a passport was
16 okay. And she said, yes, a passport's fine, too.

01:50:09

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17 And I said, I tried and they wouldn't
18 change it with a passport, but I'm really glad I can
19 use that now. And she said, well, I still need your
20 letter from a surgeon. And I said, well, since you
21 have my passport and you can use that, why do I need
22 to give you a letter from a surgeon? And she said,
23 the State needs to have it on file that you've had a
24 surgery, just in case something changes in the future
25 and we need to know about your surgery.

01:50:58

01:51:04

01:51:08

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01:51:38

1	And I felt so defeated. I just felt	01:51:43
2	broken. And I just handed it to her. I didn't say	01:51:47
3	anything. And she finally gave me my driver's	01:51:51
4	license, and it was finally right. It finally said	01:51:56
5	female. And everything has been corrected, except	01:52:04
6	for my birth certificate.	01:52:11
7	I could have just avoided all of this.	01:52:13
8	And I felt sad. I felt like that at Strawberry	01:52:19
9	Plains, whenever I had my ID and I was supposed to	01:52:25
10	just get it naturally, and I didn't. I just -- I	01:52:29
11	just -- I couldn't feel -- I couldn't feel that.	01:52:35
12	I think I need to take a break, please.	01:52:54
13	MR. LIM: Okay. Could we come back in	01:52:59
14	ten minutes?	01:53:01
15	MR. ROESSLER: Ten minutes sounds good.	01:53:03
16	MR. LIM: It's 2:44 right now, Central	01:53:07
17	time. We're going off the record. It's 2:45 now.	01:53:10
18	Let's -- I don't have a whole lot left, so we should	01:53:14
19	be wrapping up here soon. Thank you.	01:53:18
20	(Short break.)	01:53:18
21	MR. LIM: Welcome back, everyone.	02:06:33
22	BY MR. LIM:	02:06:33
23	Q. Ms. LG, I need to ask you this. Did you	02:06:36
24	speak with anyone during the break about this	02:06:39
25	deposition or about this lawsuit?	02:06:44

1	A.	No.	02:06:46
2	Q.	I only have a few questions left, so bear	02:06:50
3		with me.	02:06:53
4		Thank you for sharing. I can't even	02:06:54
5		imagine how difficult it must have been for you to go	02:07:00
6		through that and then relive that here today.	02:07:03
7		But I want to accurately know for the	02:07:06
8		record, the day of the incidents that you mentioned	02:07:11
9		that happened in --	02:07:15
10	A.	I'm sorry, your audio cut out. Could you	02:07:21
11		repeat that?	02:07:25
12	Q.	Yeah.	02:07:26
13		Your experience with the driver's	02:07:26
14		license, that happened in [REDACTED], no?	02:07:27
15	A.	Which experience are you referring to?	02:07:32
16	Q.	The last time you went to the DMV, before you	02:07:36
17		could obtain your driver's license.	02:07:44
18	A.	Yes. The last time I went to the DMV, it was	02:07:51
19		in [REDACTED].	02:07:56
20	Q.	In fact, the only interaction -- the only	02:07:57
21		incidents involving the Tennessee DMV location was	02:08:00
22		the [REDACTED] location that you mentioned?	02:08:05
23		MR. ROESSLER: Objection.	02:08:09
24		THE WITNESS: I'm sorry, I'm not sure	02:08:14
25		what you're asking.	02:08:16

1	BY MR. LIM:	02:08:18
2	Q. I'll retract that question.	02:08:18
3	Have you attempted to change your birth	02:08:26
4	certificate in Tennessee?	02:08:29
5	A. Yes, I have attempted to change my Tennessee	02:08:38
6	birth certificate.	02:08:43
7	Q. Can you describe to us what steps you have	02:08:44
8	taken to do that?	02:08:47
9	A. Whenever I received my legal name change, I	02:08:53
10	asked the county clerk what the process was, and he	02:08:57
11	let me take notes; that I needed to mail my	02:09:09
12	information -- that I needed to provide a certified	02:09:16
13	copy of my name change to various places where I	02:09:21
14	wanted it changed, and I needed to mail the certified	02:09:24
15	copy alone to the Nashville Department of Vital	02:09:30
16	Records. And whenever I did, I included with my name	02:09:37
17	change, the letter from my medical provider stating	02:09:43
18	that my gender marker needed to be updated.	02:09:48
19	And I waited and received back in the	02:09:55
20	mail the birth certificate with my correct name, but	02:10:04
21	it was just the birth certificate. There was no	02:10:11
22	letter. There was no explanation. And it had the	02:10:13
23	incorrect marker on it still.	02:10:18
24	Whenever I had gotten the name change	02:10:21
25	done, I asked the assistant clerk what I needed to do	02:10:23

1 to get my birth certificate gender marker changed, 02:10:32
2 because it wasn't made clear how I would get that 02:10:36
3 changed. And I couldn't find any documentation that 02:10:39
4 outlined how to do that. And she said, we don't do 02:10:43
5 that here. That's not going to happen. 02:10:48

6 Q. Once you received your birth certificate with 02:10:57
7 your name -- after your name change, did you take any 02:11:02
8 further additional steps to change the gender marker? 02:11:04

9 A. Whenever I received the denial, whenever I 02:11:14
10 got my birth certificate back and it was still 02:11:22
11 incorrect, and whenever I was told that it wasn't 02:11:26
12 going to happen, and whenever people refused to 02:11:33
13 explain to me ways that I would be able to get it 02:11:37
14 changed, I felt so hopeless, like it would never be 02:11:42
15 fixed. And I -- I remember seeing that -- something 02:11:48
16 in the news about the State not changing it for 02:11:58
17 anybody -- for trans women like me. 02:12:01

18 And I'm just so scared that I'm going to 02:12:11
19 have to show it to somebody; that they are going to 02:12:18
20 ask to see it. I just want it to be fixed. 02:12:24

21 Q. Okay. That concludes my questions. Thank 02:12:38
22 you, Ms. L.G. I really appreciate your time today. 02:12:43

23 MR. ROESSLER: No redirect from 02:12:48
24 Plaintiffs' counsel. 02:12:51

25 We do just want to reserve the right to 02:12:52

1 read and sign the transcript before it's final.

02:12:56

2 THE REPORTER: Mr. Lim, do you want to
3 order the original?

02:13:09

02:13:22

4 MR. LIM: Yes, please.

02:13:22

5 FURTHER DEPONENT SAITH NOT
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E R R A T A P A G E

I, L.G., having read the foregoing deposition, Pages 1 through 56, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

PAGE	LINE	SHOULD HAVE BEEN
_____	_____	_____
_____	_____	_____
_____	_____	_____
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L.G.

Notary Public
My Commission Expires: _____

C E R T I F I C A T E

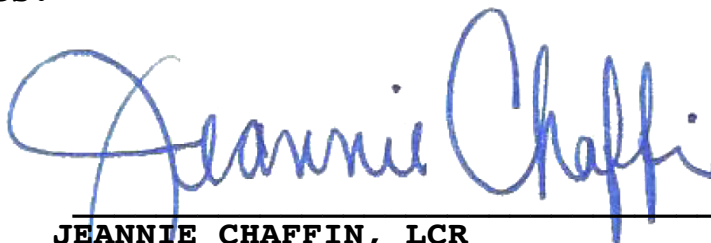
STATE OF TENNESSEE

COUNTY OF SUMNER

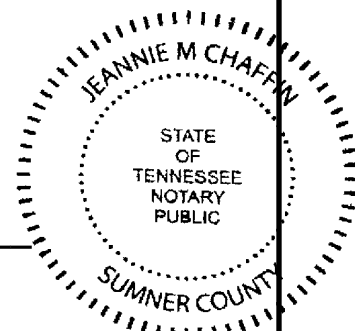
I, JEANNIE CHAFFIN, Licensed Court Reporter, with offices in Portland, Tennessee, hereby certify that I reported the foregoing videoconference deposition of L.G. by machine shorthand to the best of my skills and abilities, and thereafter the same was reduced to typewritten form by me.

I further certify that I am not related to any of the parties named herein, nor their counsel, and have no interest, financial or otherwise, in the outcome of the proceedings.

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E R R A T A P A G E

I, L.G., having read the foregoing deposition, Pages 1 through 56, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

PAGE	LINE	SHOULD HAVE BEEN
26	10	Insert "--" before "it"
27	20	"cohorts" should be "cohort"
31	2	"the" should be "that"
31	20-21	"child. Hand ..." should be "child, hand ..."
39	19	"violence when" should be "violence. When ..."
39	21-22	"changed. They ..." should be "changed, they ..."
43	21	"of" should be "for"
43	25	"has" should be "had"
44	1	"has" should be "had"
44	11	"because" should be "but"
48	2	"has" should be "had"
49	11	"me" should be "my"
49	19	"whipped" should be "worked"
51	23	"file that" should be "file, that"

L.G.

Notary Public

My Commission Expires: _____

PAGE	LINE	SHOULD HAVE BEEN
52	8-10	"And I felt sad. I felt like that at Strawberry Plains,
		whenever I had my ID and I was supposed to just get it
		naturally, and I didn't." should be "And I felt sad, I felt like,
		at Strawberry Plains whenever I got my ID. And I was
		supposed to finally feel relief. And I didn't."

My Commission Expires:

<hr/> Exhibits <hr/>			
Ex 1 4:8 29:16	accept 33:6	apologize 30:5	back 10:6 40:6,12
Ex 2 4:10 6:4	acceptable 41:8	44:13	41:5 42:18,20
<hr/> 1 <hr/>	accepting 33:9	appearance	47:20,21,23 48:1,
1 6:4 9:21 29:16	access 30:23	33:19	21 49:17,19 51:3
125 29:20	35:3	applied 10:15	52:13,21 54:19
126 32:7	accurate 40:21	approved 47:4	55:10
133 37:1	accurately 7:24	area 33:7	backed 50:16
137 38:22 45:4	53:7	articulate 30:21	bad 47:18
138 46:4	██████████	Arts 14:20 15:21	Baker 7:7
██████████	activities 19:1,11	ashamed 44:5	██████████
15 42:19	additional 55:8	51:1	bear 53:2
<hr/> 2 <hr/>	address 9:20	aspects 23:21	began 12:21
2 6:4	addresses 50:3	assaulted 32:1	13:24 31:17 32:9
20 42:19	adequate 39:23	assistant 6:11	33:6
2004 29:12	admissions	47:10 54:25	begin 29:18
██████████	27:21	attack 50:17	behaviors 31:20
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